SEP Checklist

John Hassall, Inc.

To evaluate whether a proposed project appears to meet all the requirements of the May 8, 1995 Interim revised SEP Policy, use the following checklist. For specific requirements, refer to the appropriate sections in the Policy.

I. BASIC DEFINITION

1. Proposed SEP is an environmentally beneficial project ☑
2. Defendant/respondent is undertaking SEP in settlement of enforcement action ☑
3. Defendant/respondent is not otherwise legally required to perform project ☑
4. SEP reduces neither stringency nor timeliness requirements of Federal environmental statutes and regulations. ☑

II. LEGAL GUIDELINES

1. Sufficient Nexus exists ☑
2. Project advances objectives(s) of environmental statute(s) at basis of action ☑
3. EPA plays no role in managing funds or controlling performance of SEP ☑
4. Type and scope of project are determined in signed agreement ☑
5. Does not supplement EPA appropriations ☑

III. CATEGORIES OF SEPs - project fits into one or more category

1. Public Health ☐
2. Pollution Prevention ☐
3. Pollution Reduction ☑
4. Env. Restoration and Protection ☐
5. Assessments and Audits ☐
6. Env. Compliance Promotion ☐
7. Emergency Planning & Preparedness ☐

IV CALCULATION OF THE FINAL PENALTY

1. Penalty - penalty captures economic benefit of non-compliance plus at least 10% of gravity component, or 25% of gravity, whichever is greater ☑
   Exception: For government agencies or entities or non-profit organizations, smaller penalty may be allowed pursuant to applicable penalty policy. ☐
2. SEP Cost is calculated using PROJECT computer model ☑
3. Penalty Mitigation - percentage of SEP Cost that may be applied as mitigation against penalty is determined by examining whether and how effectively project achieves following: ☑

   - ◆ Benefits to the Public or Environment at Large
   - ◆ Innovativeness
   - ◆ Environmental Justice
   - ◆ Multimedia Impacts
   - ◆ Pollution Prevention

V. OVERSIGHT AND DRAFTING

1. Settlement agreement accurately and completely describes SEP ☑
2. Defendant/respondent required to submit interim reports/audits as necessary to allow EPA to determine compliance with terms of SEP ☑
3. Final report, certified by an appropriate corporate official, documenting completion of the SEP, is required ☑
4. SEP drafting guidelines have been reviewed and applied accordingly ☑

VI. EPA PROCEDURES

1. Approvals

A) Agreement is approved by appropriate government official ☑

B) For multi-Region SEPs, all affected Regions have opportunity to review and comment ☐

C) In case where SEP may not fully comply with provisions of this Policy, Agreement approved in advance by AA for OECA ☐

D) In case where SEP involves activities outside U.S., agreement approved in advance by ORE in OECA ☐

E) For Environmental Compliance Promotion SEP (category 6.), agreement approved in advance by ORE in OECA ☐

2. Documentation - Case file includes:

A) PROJECT model printout (where applicable)

B) Description how five steps in Policy (see § A. 3. Of Policy) are met by project ☐

C) Description of expected benefits associated with SEP ☐

D) Description by enforcement attorney how legal guidelines are satisfied ☐

John Hassall, Inc.

ANALYZING SEPs - SEP Penalty Calculation

PROJECT:

Original Penalty = 61,700

1. Economic Benefit:
2. Gravity (gravity amount of penalty, after all adjustments): 43,190
3. **Preliminary Penalty (line 1 + line 2)** 43,190
4. 10% of Gravity (0.1 x line2): 4,319
5. Economic Benefit + 10% of Gravity (line 1 + line 4)

   or
6. 25% of Gravity (0.25 x line 2): 10,798
7. **Minimum Penalty (greater of line 5 or line 6):** 10,798
8. SEP Cost (from PROJECT): 53,494

Evaluation Factors	Performance Poor ---- Good
Benefits to Public or Environment at Large	----------X-
Innovativeness	------X------
Environmental Justice	-X----------
Multimedia Impacts	----------X-
Pollution Prevention	----------X-

		Yes	No
9.a	Does the SEP implement pollution prevention?	☒	☐
9.b	Is defendant small business, gov't agency or non-profit?	☐	☒

9. Not to exceed 80%, unless "Yes" is checked in 9.a or b; never greater than 100%

   Percent Mitigation 60.55 %

   Worth 80%, but limited to above

10. **SEP Mitigation (line 8 x line 10):** 32,393

11. Must be equal to or greater than minimum penalty caculated in 7., above.

    Final Penalty (line 3 - line 11): 16,798

    Rounded up from 10,797.5

SEP PENALTY CALCULATION WORKSHEET

This worksheet should be used pursuant to section E of the Policy.
Specific Applications of this Worksheet in a Case Are Privileged, Confidential Documents.

STEP	AMOUNT
STEP 1: CALCULATION OF SETTLEMENT AMOUNT WITHOUT A SEP	
1.a. BENEFIT: The applicable penalty policy is used to calculate the economic benefit of noncompliance.	$
1.b. GRAVITY: The applicable penalty policy is used to calculate the gravity component of the penalty; this is gravity after all adjustments in the applicable policy.	$ 61,700
1.c. SETTLEMENT AMOUNT without a SEP: Sum of Step 1.a. plus 1.b.	$ 43,190
STEP 2: CALCULATION OF THE MINIMUM PENALTY AMOUNT WITH A SEP	
2.a 10% of GRAVITY: Multiply amount in Step 1.b by 0.10	$
2.b. BENEFIT PLUS 10% of Gravity: Sum of Step 1.a plus Step 2.a	$
2.c. 25% of GRAVITY: Multiply amount in Step1.b. by 0.25	$ 10,798
2.d. MINIMUM PENALTY AMOUNT: Select greater of Step 2.c or Step 2.b	$ 10,798
STEP 3: CALCULATION OF THE SEP COST USING THE PROJECT MODEL	$ 53,494
for 5 yrs	
STEP 4: CALCULATION OF MITIGATION PERCENTAGE AND MITIGATION AMOUNT	
4.a. SEP Cost Mitigation Percentage. Evaluate the project pursuant to the 6 mitigation factors in the Policy. Mitigation percentage should not exceed 80% unless one of the exceptions applies.	60.55 %
4.b. SEP Mitigation Amount. Multiply Step 3 by Step 4.a.	$ 32,393
STEP 5: CALCULATION OF THE FINAL SETTLEMENT PENALTY	
5.a. Subtract Step 4.b from Step 1.c	$ 10,798
5.b. Final Settlement Penalty: Select greater of Step 2.d or Step 5.a.	$ 10,798

Run Name =	Run5years
Present Values as of Project Operation Date:	01-Dec-2009
A) Capital & Other One-Time Costs	$33,188
B) Annually Recurring Costs (see detailed printouts)	$21,381
C) Initial Project Value (A+B)	$54,568
D) Final Proj. Value at Penalty Payment Date:	
01-Sep-2009	**$53,494**
Discount Rate (C Corporation)	8.3%
Capital Investment or Other Initial Expenditure:	
Cost Estimate	$33,000
Estimate Date	01-Sep-2009
Inflation Rate	2.3%
Annual Costs:	
Cost Estimate	$5,000
Estimate Date	01-Sep-2010
Inflation Rate	2.3%
Number of Credited Years	5

Run Name = Run5years

Present Values as of Project Operation Date:	01-Dec-2009
A) Capital & Other One-Time Costs	$33,188
B) Annually Recurring Costs (see detailed print	$21,381
C) Initial Project Value (A+B)	$54,568
D) Final Proj. Value at Penalty Payment Date:	
01-Sep-2009	**$53,494**
Discount Rate (C Corporation)	8.3%
Capital Investment or Other Initial Expenditure:	
Cost Estimate	$33,000
Estimate Date	01-Sep-2009
Inflation Rate	2.3%
Annual Costs:	
Cost Estimate	$5,000
Estimate Date	01-Sep-2010
Inflation Rate	2.3%
Number of Credited Years	5

B) Annually Recurring Costs

Year:	1	2	3	4	5	6	7	8	9
Period of Annual Costs; From:	01-Dec-2009	01-Dec-2010	01-Dec-2011	01-Dec-2012	01-Dec-2013				
To:	01-Dec-2010	01-Dec-2011	01-Dec-2012	01-Dec-2013	01-Dec-2014				
Annual Costs	($4,972)	($5,086)	($5,203)	($5,323)	($5,445)				
Applicable Marginal Tax Rate	0.0%	0.0%	0.0%	0.0%	0.0%				
Net After-Tax Cash Flow	($4,972)	($5,086)	($5,203)	($5,323)	($5,445)				
PV Factor: Adjusts Cash Flow to POD	0.9609	0.8873	0.8192	0.7563	0.6984				
PV Cash Flow as of POD	($4,777)	($4,513)	($4,262)	($4,026)	($3,803)				
Total PV as of POD:	($21,381)								

Mary Kowalski/R2/USEPA/US
08/05/2008 02:00 PM

To vp@hassall.com
cc Ted Smith
bcc
Subject Re: John Hassall Inc. 11590JHNHS6091C

Thank you for the information. I will compare it with what I have in your file. Do you have any idea when you may have a project proposal ready to submit.

Kind regards,
Mary Ann

Mary A. Kowalski, MS, MPH
R2 TRI Program Enforcement Coordinator
Pesticides and Toxic Substances Branch
PH.: (732) 906-6815, FAX: (732) 321-6788
kowalski.mary@epa.gov

"Vic Palese" <vp@hassall.com>

"Vic Palese"
<vp@hassall.com>
08/05/2008 12:59 PM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc Ted Smith
Subject John Hassall Inc. 11590JHNHS6091C

Hello Ms. Kowalski

Please find below, the information you requested in your letter dated July 18, 2008. As we discussed, John Hassall Inc. would like to pursue the settlement without issuance of a formal complaint. We are also interested in developing an environmental project in the area of wastewater that will consistently exceed current permit requirements.

Over the past several weeks I have had contact with numerous vendors to discuss the project. I have also provided them with wastewater samples for bench top testing. Once the homework is completed, we will be able to present you with a project that will hopefully meet your expectations.

Vic Palese

Pounds of chromium, copper and lead processed in 2006:

chromium 51,278

copper	215,152
lead	283

Number of Employees:

2006	108
2008 (Present)	93

Gross annual sales:

2006	$19,088,299.00
2007	$18,659,426.00
2008 - through 6/30/08	$ 8544,780.00

State of incorporation:

Incorporated in New York as a " C" corporation.

Baker Associates
179 buckingham Ave
Milford, Ct. 06460
203-877-3591
email-bakermilford@aol.com

10/1/2008

Vic Palese
J Hassall
609 Cantiague Rock Road
Westbury, N.Y 11590

Re: Waste Treatment system

Dear Vic,

I wanted to drop you this email to make sure you like my idea before I spend hours Engineering it, and Costing it.

You have said that you want to be able to treat 2000 gal/ day, or 10,000 gal/week of waste water. You also said that you wanted to be able to store at least a days worth of water, should some component fail.

Two thousand gal/ per eight hours is 5 GPM. I had originally planned on doing a batch system and filtering every drop thru the filter press as a final filter, but your flow rate is two great to allow this. I am recommending a continuous flow system, where pH is controlled thru a meter and a metering pump, T-500 is controlled thru an ORP meter and a metering pump, and chemistry such as the Hubbard Hall ACP(Calcium chloride and Aluminum), and the Aqua-Pure AS-(anionic polymer) are pumped at a controlled rate at all times when the transfer pump is feeding fresh waste water to the treatment system. The sludge would be removed thru use of an air driven pump, whose air solenoid is powered by a repeat cycle timer circuit.

I have chosen two (2) Chemtainer 2500gal cone bottom vertical plastic bulk storage tanks as your holding tanks. Pump #5 could be an air driven pump if you suspect you will be pumping small tumbling rock thru the system or a magnetic coupled pump, or even an all plastic pump with a mechanical seal such as the MDM pump.

I normally provide with a flow meter to record total gallons to the sewer each day, as well as a final recording circular or strip chart recorder to prove the water going to the sewer met discharge requirements. Not shown in the drawing are two hose type oil skimmers, which can take their oil by dropping the belt thru the 12" manhole fitting provided thru the top of each tank. These would drain to an empty 55 gal plastic drum for removal, or we can give you an evaporator to boil the water phase off from the oil .

I normally use an Idec programmable controller, but can use Allen Bradley if you so desire. Allen Bradley components are about 2x as expensive as the components, I normally use, which are distributed by Automation Direct, out of Atlanta, Georgia.

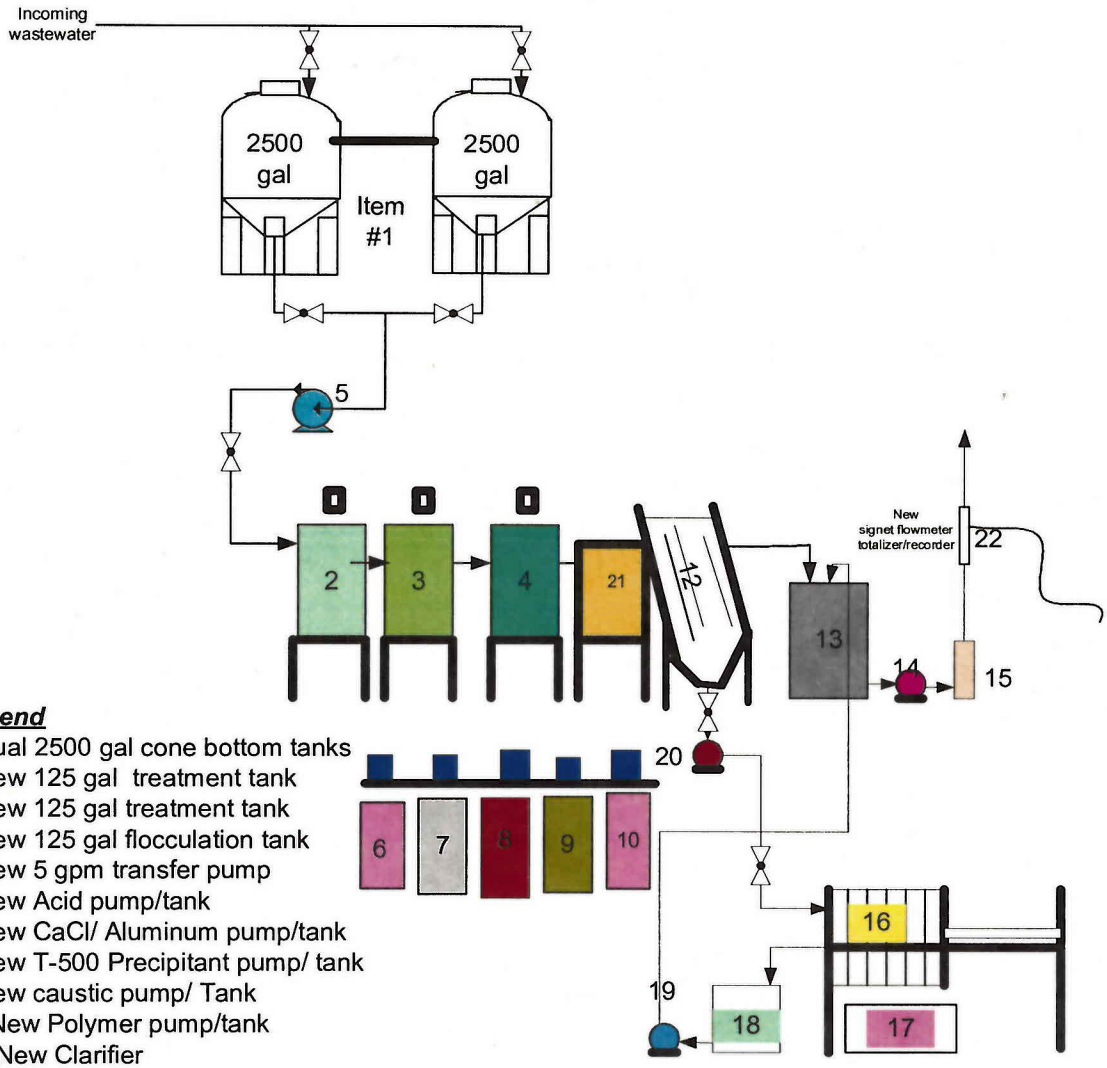
My estimate of your costs are $60,000-$100,000.00, depending on components and features requested. I have produced a similar system at Birken Manufacturing, in Bloomfield, Ct. I have pictures of the system, and am sure I could get you in to see it, if you so desire.

Please respond back your thoughts, and I will finalize my proposal to you. I can come down if desired, at your convenience.

Regards,

Bob Baker- Sales

NOTE- SEE PAGE #3 FOR ATTACHED DRAWING



Legend

1 Dual 2500 gal cone bottom tanks
2 New 125 gal treatment tank
3 New 125 gal treatment tank
4 New 125 gal flocculation tank
5 New 5 gpm transfer pump
6 New Acid pump/tank
7 New CaCl/ Aluminum pump/tank
8 New T-500 Precipitant pump/ tank
9 New caustic pump/ Tank
10 New Polymer pump/tank
12 New Clarifier
13 New Clean Water holding tank
14 New Transfer Pump
15 New Final Cartridge Filter
16 New Filter Press
17 New Sludge Cart
18 New Transfer Sump
19 New Final Transfer pump
20 New Sludge Pump
21 New electrical control panel
22 Signet flow meter

Baker Associates
179 Buckingham Ave
Milford, Ct. 06460
203-877-3591

Revised 10/01/2008

"Vic Palese"
<vp@hassall.com>
10/31/2008 09:17 AM
Please respond to
<vp@hassall.com>

To "'Gary Dixon'" <gdixon@samsco.com>
cc
bcc
Subject RE: Wastewater Test

Gary,

Thank you for the brief summary - Look forward to the more detailed proposal next week.

Vic
-----Original Message-----
From: Gary Dixon [mailto:gdixon@samsco.com]
Sent: Thursday, October 30, 2008 3:47 PM
To: Vic Palese
Subject: Wastewater Test

Vic,

This is just a quick note to give you the bottom line on our testing. It looked great!

The water came to us at 11.2 pH with 108 ppm of Chlorides. It boiled at 212 oF and foamed as it boiled.
We succeeded in removing (evaporating) 98%, leaving a 50x concentrated residue for your final disposal at a pH of 12.1, (it was boiling at 220 oF with 5,400 ppm Chlorides).
We found an effective antifoam chemistry that controlled the aggressive foam and we saw no significant solids loading.

If you decide to go further we want to run a larger test to fine tune our antifoam estimate. Next week I'll get you a more detailed report and system proposal.

Gary Dixon
Sr. Application Engineer
SAMSCO WASTEWATER EVAPORATOR SYSTEMS
18 Cote Avenue, Goffstown, NH, 03045 USA
Tel: 603-668-7111 Fax: 603-647-0537 E-mail: gdixon@samsco.com

"Vic Palese"
<vp@hassall.com>

01/13/2009 11:33 AM

Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA

cc

bcc

Subject Evaporator draft proposal - more to come.

History: This message has been replied to.

Mary Ann,

I am sending this e-mail to you today to keep you informed as to where I am in the process. The data below speaks to the Evaporator only and is somewhat comprehensive.

I will send you more data latter on in the week regarding the cost associated with the way we treat water now - hopefully as comprehensive as this for the comparison you need. We believe it to be about 1/2 the cost per gallon as of now - and even according to Samsco (the Evaporator Company) that is the general rule of thumb - I don't want to miss anything.

The costs associated with the installation of the Evaporator appear to be about $43,500 (Not including Tax) as illustrated below.

The O&M costs are forth coming from the Manufacturer- and the extra cost associated with the actual running of the unit is called out below and based upon a price per therm - Obviously this could vary with the price of energy. It is this operating cost that would be the ideal variable to allow us to qualify for the SEP and at the same time treat some water in our present system to save cost.

Capital Costs - as stated by well known supplier Samsco:

Qty	Evaporator	Unit Price	Total Price
1	Series 500 (P/N M506NAA)	15-18 gph Evaporator · 316L Stainless Steel Tank and Heat Exchanger · UL Approved Control System · Allen Bradley PLC-controlled Sentry System · Allen Bradley PanelView Display · Stainless Steel Evaporator Exterior · NEMA 4 Control Enclosure · Automatic-fill Level Sensor · High-level Alarm Control · External Gas Volume Meter · 110V, 60 Hz (others available) · 2 Year Warranty (includes corrosion protection)	$21,997
	Evaporator Options (items recommended for evaporator service)		
1	Upgrade to Chloride Resistant unit (P/N M50CNAA)	$ 4,351	
1	Combustion Analysis Kit (Portable Electronic for Burner tune-up)	$ 895	
2	Gas Pressure Gauge (simplifies Burner tune-up)	$ 89	$ 178
1	Stack Adapter (specify for SS or CPVC stack)	$ 279	
	Basic Evaporator System (extended items only)		$27,700
	Optional System Features (see "Sentry System" page)		none

Optional System Accessories (see "System Accessories" page) $ 2,524
Total Samsco System: $30,224
Optional Professional Services (see "Services Support" page) $ 2,545
Optional System Installation (see "Services Support" page) TBD

Environmental Wastewater Analysis
Samsco works with analytical laboratories across the U.S. We are pleased to coordinate regulatory work for our clients by arranging laboratory analyses as requested. Typical tests are…

EPA 8260 Volatile Organic Compound (VOC) Analysis (4-day turnaround) $ 350

TCLP Metals Analysis (RCRA-8 Heavy Metals Test) $ 300

Regulatory Permitting Assistance
To ensure environmental compliance, Samsco's Environmental Group offers a permitting service that prepares, coordinates, and expedites the air quality or hazardous materials application paperwork required by your state or regulatory agency.

Air Quality (Application preparation and coordination with State) $ 2,195
1. Review process, MSDS's, and VOC testing to define the scope of regulatory issues
2. Prepare mass balances based on VOC testing, waste volume, and evaporator model
3. Review current status of regulations for the site state · Consider prior submittals · Contact local air quality authority · Determine exemptions, permit application, or notification submittal required
4. Draft client's letter to regulating authorities · Prepare application or notification forms required
5. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
Letter to client defining regulatory requirements and action items required
Letter for package submittal to regulators (if required)
Prepare forms for client to add site-specific information and sign
Prepare process block diagram
Calculate estimate of emission by mass balance for VOC's and burner emissions
Organize appropriate analytical data and MSDS package

Hazardous Material (Application preparation and coordination with State) $2,695
Includes the following:
1. Review process, MSDS's, TCLP, and VOC testing to define the scope of any regulatory issues
2. Review current status of regulations for the site state · Consider prior state submittals · Contact local hazardous waste and water quality authorities · Define whether or not RCRA (B) Permit exemption is feasible ·

Define appropriate submittal required for (a) limited permitting, (b) permit-by-rule, (c) tiered permitting, and (d) path to determination of exemption (notification method, etc.)

3. Draft letter to regulating authorities · Prepare application or notification forms required

4. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:

· Letter to client defining regulatory requirements and action items required

· Letter for package submittal to regulators (if required)

· Prepare forms for client to add site-specific information and sign

· Prepare proposed system's technical information and process block diagram

· Calculate estimate of emission by mass balance for VOC's and burner emissions

· Correlate Air Quality Submittal data

· Organize appropriate analytical data and MSDS package

· Regulatory background of product and exemption/approval precedents

Total Suggested Services.....$2,545

Samsco Evaporator Products
~ Professional Services Support ~
(Cont)

Technical Consultation & Service

· TELEPHONE SUPPORT FOR LIFE OF EVAPORATOR Free/Unlimited

· INSTALLATION: ..... To be quoted following Contractor's Site Visit

Mechanical installation of equipment will include placement and connection using client's existing (within 10 ft) electrical, plumbing, and fuel sources, as well as supply and installation of exhaust stack, piping, and valves as required by Samsco. It also includes securing necessary permits and complying with inspection criteria as required by local code enforcement authorities. (Assuming permitting/inspection requirements are normal and customary for U.S. industrial sites. If unusual requirements are encountered, additional costs may result.)

· SYSTEM STARTUP & COMMISSIONING by SAMSCO Engineer .$995/on-site day (Portal-to-portal)

Includes pre-installation consultation, supervision of system start-up, system adjustments as required, and operator training.

\+ Travel at cost (Requires 2-week notice)

NOTES:

1. Additional $500 charge if the visit/travel is outside normal business hours (e.g., weekends).

2. Days needed to complete task beyond initial estimate will be

billed at
contracted rate.
3. Ask for details of Samsco Service Plans offered for multiple (e.g.
annual) pre-scheduled visits
4. Because Samsco engineer's responsibility is problem identification and
correction of evaporator manufacture problems, service visits will require client to assume the following responsibilities:
· Proper installation of evaporator per Samsco manual, in consultation with
our engineers
· Electrical checkout to confirm proper power connection
· Initial 60-second firing of gas burner, where applicable
· Reporting of any problems to Samsco
· Ramp up to recommended cycle time per Samsco consultation
· Maintenance of "Observation and Maintenance" chart
· Emptying of evaporator at appropriate intervals
· Skimming floating oil when required
· Routine cleaning of evaporator interior after emptying
· Routine cleaning of evaporator exterior, mist eliminator, and other
serviceable components
· Pre-repair cleaning of evaporator to allow Samsco engineers to meet visit'
s objectives
· Plumbing, electrical, and mechanical contracting services as required.

In addition to this we are estimating :
Transportation: $
1000 Awaiting feedback from Samsco- Estimated
Rigging:
$ $500 Estimated
Gas pipe installation: $ $500
Estimated
Plumbing and Electric hookup: $ $2500
Estimated

Operating Cost:

Cost of Evap: 1 Gallon @ $0.104 /gallon (Calculated based on actual rate of
Natural Gas = $0.87/Therm)

Operator maintenance: $ TBD Awaiting feedback from Samsco

Vic Palese

SAMSCO WATER EVAPORATOR II

~ 600 SERIES • GAS-FIRED ~

QTY	EVAPORATOR	UNIT PRICE	TOTAL PRICE
1	**SERIES 600 (P/N M606NAA)** 33-39 gph Evaporator • 316-L Stainless Steel Tank and Heat Exchanger • UL-approved Control System • Allen Bradley PLC-controlled *SENTRY SYSTEM* • Allen Bradley PanelView Display • Stainless Steel Evaporator Exterior • NEMA-4 Control Enclosure • Automatic-fill Level Sensor • High-level Alarm Control • External Gas Volume Meter • 110V, 1 Ph, 60 Hz power *(others available)* • 2-year Warranty *(includes corrosion protection)*		**$35,189**
	EVAPORATOR ACCESSORIES *(ITEMS RECOMMENDED FOR EASY EVAPORATOR SERVICE)*		
1	Chloride Resistant unit upgrade **(M60CNAA)**		**$ 5,046**
1	Combustion Analysis Kit *(Portable Electronic for Burner tune-up)*		**$ 895**
1	Gas Pressure Gauge Set of 2 gauges *(simplifies Burner tune-up)*		**$ 178**
1	Stack Adapter *(specify for stack of SS or CPVC)*		**$ 279**
	BASIC EVAPORATOR SYSTEM *(EXTENDED ITEMS ONLY)*		**$41,587**
	OPTIONAL SYSTEM FEATURES *(SEE "SENTRY SYSTEM OPTIONS" PAGE)*		**none**
	OPTIONAL SYSTEM ACCESSORIES *(SEE "SYSTEM ACCESSORIES" PAGE)*		**$ 3,724**
	TOTAL SAMSCO SYSTEM:		**$45,311**
	OPTIONAL PROFESSIONAL SERVICES *(SEE "SERVICES SUPPORT" PAGE)*		**$ 2,545**
	OPTIONAL INSTALLATION *(SEE "SERVICES SUPPORT" PAGE)*		**TBD**

~ TERMS & CONDITIONS OF SALE ~

- Pricing: Quotation valid for 30 days from this date
- Payment: 50% deposit with Purchase Order
  Balance due 30 days from date of product shipment,
  1-1/2% monthly charge on amounts due past 30 days
- Shipment: FOB Cleveland, OH
- Cancellation: 25% Restocking Fee for canceled orders

SIGNED: *Gary N. Dixon* January 8, 2009

SAMSCO CORPORATION • 18 Cote Avenue • Goffstown, NH 03045 USA • 603-668-7111 • info@samsco.com

SAMSCO WATER EVAPORATOR II
~ SENTRY SYSTEM OPTIONS ~

QTY	SENTRY SYSTEM OPTIONS	UNIT PRICE	TOTAL PRICE
	AUTO OIL DECANT OPTION (See note below)	$ 2,475	
	AUTO OIL MANAGEMENT OPTION (See note below)	$ 5,556	
	AUTO DRAIN OPTION (See note below)	$ 3,879	
	AUTO DRAIN/AUTO OIL MANAGEMENT OPTION (See note below)	$ 9,435	
	AUTO-pH CONTROL OPTION	$11,500	
	CONDUCTIVITY CONTROL OPTION	$ 5,748	
	REMOTE MONITOR OPTION	$ 1,750	
	AUTO ANTIFOAM INJECTION OPTION	$ 1,495	
	ALARM BEACON OPTION	$ 495	
	AUTO VAPOR RECOVERY OPTION		
	SERIES 600 CONDENSER MODULE	$21,640	
	~ AND ~		
	SERIES 600 DRY AIR COOLER (400K BTU)	$19,143	
	STANDS		
	SERIES 600 STAND (≤ 24" HIGH)	$ 995	
	OPTIONS SUGGESTED:		$ TBD

NOTE: **Includes** required evaporator-mounted probes and auto-valve(s), but **does not include** transfer pump kits. See separate data/price pages for exact components included.

SAMSCO WATER EVAPORATOR
~ SYSTEM ACCESSORIES ~

QTY	SYSTEM ACCESSORIES	UNIT PRICE	TOTAL PRICE
	• Holding Tank: 175 Gallon Capacity (42" Dia x 49" Hgt)	$ 889	
	• Holding Tank: 500 Gallon Capacity (48" Dia x 85" Hgt)	$ 1,733	
	• Holding Tank: 1,050 Gallon Capacity (72" Dia x 84" Hgt)	$ 2,316	
	• Holding Tank: 1,600 Gallon Capacity (88" Dia x 94" Hgt)	$ 2,957	
	• Holding Tank: 2,500 Gallon Capacity (96" Dia x 117" Hgt)	$ 4,642	
	• Tank Sensor: High Level (for Residue Tank or Waste Feed Tank)	$ 759	
	• Tank Sensor: Low Level (up to 8' long, for Waste Feed Tank)	$ 899	
	• Sensor Mount: Single Union (for Holding Tank Level Sensor)	$ 52	
	• Sensor Mount: Four Union (for Tank Level Sensors and Ground Rod)	$ 389	
	• Ground Rod (up to 8' long, required for Sensors in Non-metal Holding Tank)	$ 95	
	• Pump: E5 Poly w/Teflon Diaphragm (for **Cold Waste Feed**)	$ 629	
	• Pump: E5 SS w/Teflon Diaphragm (for **Hot Residue Drain**)	$ 1,299	
1	• Pump: E1 Poly w/Teflon Diaphragm (for Cold Waste Feed)		**$1,259**
1	• Pump: E1 SS w/Teflon Diaphragm (for Hot Residue Drain)		**$1,799**
	• Pump: E4 Poly w/Teflon Diaphragm (for Cold Waste Feed)	$ 2,979	
	• Pump: E4 SS w/Teflon Diaphragm (for Hot Residue Drain)	$ 3,489	
	• Pump Accessory: E5 Air Solenoid Valve Kit (1/Pump)	$ 89	
2	• Pump Accessory: E5/E1 Air Regulator & Filter Kit (1/Pump)	$ 139	**$ 238**
2	• Pump Accessory: E1/E4 Solenoid Valve Kit (1/Pump)	$ 214	**$ 428**
	• Pump Accessory: E4 Air Regulator, Filter, & Lubricator Kit (1/Pump)	$ 329	
	TYPICAL SYSTEM ACCESSORIES:		**$3,724**

- ***Holding Tanks are 120°F-rated, molded polyethylene (other tank materials are available) with conical bottom, domed top, and manway. Tanks include stand and are drop-shipped FOB nearest point of tank manufacture.***
- ***If ordered, Tank bulkhead fittings (for Evaporator Feed and Tank Drain), interior piping, and Tank Level Control mounting plate are shipped with Evaporator for on-site installation.***

SAMSCO EVAPORATOR PRODUCTS
~ PROFESSIONAL SERVICES SUPPORT ~

ENVIRONMENTAL WASTEWATER ANALYSIS

Samsco Corporation works with analytical laboratories across the U.S. We will coordinate regulatory work for our clients by arranging laboratory analyses as requested. Typical tests are...

EPA 8260 Volatile Organic Compound (VOC) Analysis (1-week turnaround) ..... **$ 350**

TCLP Metals Analysis (RCRA-8 Heavy Metals Test) ..... **$ 300**

REGULATORY PERMITTING ASSISTANCE

To ensure environmental compliance, Samsco Corporation' Environmental Group offers a permitting service that prepares, coordinates, and expedites the air quality or hazardous materials application paperwork required by your state or regulatory agency.

AIR QUALITY (Application preparation and coordination with State) ..... **$ 2,195**

1. Review process, MSDS', and VOC testing to define the scope of regulatory issues
2. Prepare mass balances based on VOC testing, waste volume, and evaporator model
3. Review current status of regulations for the site state • Consider prior submittals • Contact local air quality authority • Determine exemptions, permit application, or notification submittal required
4. Draft client's letter to regulating authorities • Prepare application or notification forms required
5. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
    - Letter to client defining regulatory requirements and action items required
    - Letter for package submittal to regulators (if required)
    - Prepare forms for client to add site-specific information and sign
    - Prepare process block diagram
    - Calculate estimate of emission by mass balance for VOC's and burner emissions
    - Organize appropriate analytical data and MSDS package

HAZARDOUS MATERIAL (Application preparation and coordination with State) **$2,695**

Includes the following:

1. Review process, MSDS', TCLP, and VOC testing to define the scope of any regulatory issues
2. Review current status of regulations for the site state • Consider prior state submittals • Contact local hazardous waste and water quality authorities • Define whether or not RCRA (B) Permit exemption is feasible • Define appropriate submittal required for (a) limited permitting, (b) permit-by-rule, (c) tiered permitting, and (d) path to determination of exemption (notification method, etc.)
3. Draft letter to regulating authorities • Prepare application or notification forms required
4. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
    - Letter to client defining regulatory requirements and action items required
    - Letter for package submittal to regulators (if required)
    - Prepare forms for client to add site-specific information and sign
    - Prepare proposed system's technical information and process block diagram
    - Calculate estimate of emission by mass balance for VOC's and burner emissions
    - Correlate Air Quality Submittal data
    - Organize appropriate analytical data and MSDS package
    - Regulatory background of product and exemption/approval precedents

Suggested Environmental Services $2,545

SAMSCO EVAPORATOR PRODUCTS
~ PROFESSIONAL SERVICES SUPPORT ~
(CONT)

TECHNICAL CONSULTATION & SERVICE

- **TELEPHONE SUPPORT (FOR EVAPORATOR LIFE) ..... Free/Unlimited**

- **INSTALLATION:** ..... Will be quoted subject to confirming Site Visit and assumes mechanical installation of quoted equipment including placement and connection using client's existing (within 10 ft) electrical, plumbing, and fuel sources, as well as supply and installation of exhaust stack, piping, and valves as required by Samsco. It also includes securing necessary permits and complying with inspection criteria as required by local code enforcement authorities. Requirements are assumed to be "normal and customary" for U.S. industrial sites. This will be confirmed following installer's site visit. If unusual requirements exist, additional cost may be involved.

- **SYSTEM STARTUP & COMMISSIONING by SAMSCO Engineer** .....$995/on-site day (Portal-to-portal) + Travel at cost
  Includes pre-installation consultation, supervision of system start-up, system adjustments as required, and operator training. (Requires 2-week notice)

- **POST-INSTALLATION SITE VISIT** (with 2-week notice) .....As Above
  Priority visit (requires at least 24 hour notice) ..... $1,500/on-site day

NOTES:

1. Additional $500 charge if the visit/travel is outside normal business hours (e.g., weekends).
2. Days needed to complete task beyond initial estimate will be billed at contracted rate.
3. Samsco offers Service Plans for *multiple* (e.g. regular, annual) pre-scheduled visits
4. Because Samsco engineer's responsibility is problem identification and correction of evaporator manufacture problems, service visits require client to assume the following responsibilities:
   - Proper installation of evaporator per Samsco manual (in consultation with our engineers)
   - Electrical checkout to confirm proper power connection
   - Initial 60-second firing of gas burner, if applicable
   - Reporting of any problems to Samsco
   - Ramp up to recommended cycle time per Samsco consultation
   - Maintenance of "Observation and Maintenance" chart
   - Emptying of evaporator at appropriate intervals
   - Skimming floating oil when required
   - Routine cleaning of evaporator interior after emptying
   - Routine cleaning of evaporator exterior, mist eliminator, and other serviceable components
   - Pre-repair cleaning of evaporator to allow Samsco engineers to meet visit's objectives
   - Plumbing, electrical, and mechanical contracting services as required.

~ yr ago 10,000 per wk
now ↓ 20 -> 30%

5 -> 10 ¢ per gallon

"Vic Palese"
<vp@hassall.com>
10/14/2008 09:15 AM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject RE: John Hassall Project Proposal

do not have to contend w/ inspections w/ 2

Mary Ann,

The gremlins are back at work on my PC I suppose. Here is the attachment opened as follows:

Hello Mary Ann,

As we discussed last week, I am nearing the end of the process to determine all the related costs and details associated with our proposed wastewater project.

As requested, I will state the intent of the project in very simple terms. This will allow you to determine if it fits into the guidelines the EPA has set forth and if they approve of the concept.

If we get positive feed back from you, I will at that time be able to provide specific costs and project details to support the information contained in this initial proposal.

We generate wastewater that currently requires the addition of the following treatment chemicals prior to discharge into the sewer system:

pH adjustment Utilizing
Carbon Dioxide

Precipitation of metals Utilizing
Hydrated Lime

Removal of emulsified oils Utilizing Calcium
Chloride & Carbon

Polishing Filter Utilizing
Diatomaceous Earth

We are currently exploring two (2) alternative methods for our wastewater treatment, as follows:

Proposal # 1

Chemical treatment utilizing different treatment chemicals and hardware. Basically a PLC will sense the waste stream and automatically dispense an efficient addition of coagulants and flocculating agents to a continuous flow system to achieve the same end.

The noteworthy aspect of this proposal is an anticipated reduction of solids generated from the treatment process. Perhaps we could also set aggressive

parameters that exceed POTW regulations - 25% or so.

Based on the data to date, the operating cost of treatment and disposal could very well be cost neutral.

Proposal # 2

Evaporator technology. Essentially, the water would be evaporated leaving only residue.

The noteworthy aspect of this proposal is zero discharge into the local sewer system as well as a reduction in the solids simply due to the fact that there would be no chemical additions used for treatment.

The cost of this project would be more costly than our current system.

We believe there is environmental merit to both proposals and request your thoughts on the matter

-----Original Message-----
From: Kowalski.Mary@epamail.epa.gov
[mailto:Kowalski.Mary@epamail.epa.gov]
Sent: Tuesday, October 14, 2008 8:11 AM
To: vp@hassall.com
Subject: Re: John Hassall Project Proposal

Certainly, but there was no attachment!

Mary Ann

Mary A. Kowalski, MS, MPH
R2 TRI Program Enforcement Coordinator
Pesticides and Toxic Substances Branch
PH.: (732) 906-6815, FAX: (732) 321-6788
kowalski.mary@epa.gov

"Vic Palese"
<vp@hassall.com>

10/13/2008 03:33 PM

Please respond to
<vp@hassall.com>

To: Mary Kowalski/R2/USEPA/US@EPA
cc:
Subject: John Hassall Project Proposal

"Vic Palese"
<vp@hassall.com>
10/15/2008 10:14 AM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject RE: John Hassall Project Proposal

Mary Ann,

As we discussed on the phone today 10/115/08 :

We are not required to make these changes at all. Our POTW is Cedar Creek in Nassau County, NY.

Currently we are allowed to discharge into the sewer following Nassau County regulations. They typically collect samples and monitor to assure we are in their limits - metals, oils, pH etc....

No fees are charged for sewer usage - there is no gain what so ever there.

For the Evaporator:

Sludge disposal would go down in volume due to the new chemistry but based upon the cost per therm for natural gas the cost would increase to treat the water. Based upon my research it is known by everyone in the wastewater industry to be a somewhat more expensive option than sewer discharge and this takes all into account.

For the Chemistry:

Still trying to make a determination on the exact cost of the sludge - as we discussed I have a sample in hand that I will determine weight of dewatered sludge this week - This way we will be in a position to see if the project is cost neutral or....

Vic
Message-----
From: Kowalski.Mary@epamail.epa.gov
[mailto:Kowalski.Mary@epamail.epa.gov]
Sent: Tuesday, October 14, 2008 3:46 PM
To: vp@hassall.com
Subject: RE: John Hassall Project Proposal

I discussed the two proposals with management. As the first proposal would be cost neutral, it would not fly as a SEP. As far as the second proposal is concerned, I must ask what the current permit allows; are you being required to make these changes; is there a fee for discharging to the POTW at the current levels, would the fees for disposing of the sludge containing the metals change. Perhaps, we should discuss this over the phone. The other option is for the company to simply pay the fine in one payment or in several installments.

Thank you,
Mary Ann

Mary A. Kowalski, MS, MPH
R2 TRI Program Enforcement Coordinator

Mary Ann,

I am sending this e-mail to you today to keep you informed as to where I am in the process. The data below speaks to the Evaporator only and is somewhat comprehensive.

I will send you more data latter on in the week regarding the cost associated with the way we treat water now - hopefully as comprehensive as this for the comparison you need. We believe it to be about 1/2 the cost per gallon as of now - and even according to Samsco (the Evaporator Company) that is the general rule of thumb - I don't want to miss anything.

The costs associated with the installation of the Evaporator appear to be about **$43,500** (Not including Tax) as illustrated below.

The O&M costs are forth coming from the Manufacturer- and the extra cost associated with the actual running of the unit is called out below and based upon a price per therm - Obviously this could vary with the price of energy. It is this operating cost that would be the ideal variable to allow us to qualify for the SEP and at the same time treat some water in our present system to save cost.

Capital Costs - as stated by well known supplier Samsco:

Qty	Evaporator	Unit Price	Total Price
1	Series 500 (P/N M506NAA) 15-18 gph Evaporator · 316L Stainless Steel Tank and Heat Exchanger · UL Approved Control System · Allen Bradley PLC-controlled Sentry System · Allen Bradley PanelView Display · Stainless Steel Evaporator Exterior · NEMA 4 Control Enclosure · Automatic-fill Level Sensor · High-level Alarm Control · External Gas Volume Meter · 110V, 60 Hz (others available) · 2 Year Warranty (includes corrosion protection)		$21,997
	Evaporator Options (items recommended for evaporator service)		
1	Upgrade to Chloride Resistant unit (P/N M50CNAA)		$4,351
1	Combustion Analysis Kit (Portable Electronic for Burner tune-up		$895
2	Gas Pressure Gauge (simplifies Burner tune-up)	$89	$178
1	Stack Adapter (specify for SS or CPVC stack)		$279
	Basic Evaporator System (extended items only)		$27,700
	Optional System Features (see "Sentry System" page)		none
	Optional System Accessories (see "System Accessories" page)		$ 2,524
	Total Samsco System:		$30,224
	Optional Professional Services (see "Services Support" page)		$2,545
	Optional System Installation (see "Services Support" page)		
	TBD		

Environmental Wastewater Analysis
Samsco works with analytical laboratories across the U.S. We are pleased to coordinate regulatory work for our clients by arranging laboratory analyses as requested. Typical tests are…

EPA 8260 Volatile Organic Compound (VOC) Analysis (4-day turnaround) $ 350

TCLP Metals Analysis (RCRA-8 Heavy Metals Test) **$ 300**

Regulatory Permitting Assistance
To ensure environmental compliance, Samsco's Environmental Group offers a permitting service that prepares, coordinates, and expedites the air quality or hazardous materials application paperwork required by your state or regulatory agency.

Air Quality (Application preparation and coordination with State) **$2,195**
1. Review process, MSDS's, and VOC testing to define the scope of regulatory issues
2. Prepare mass balances based on VOC testing, waste volume, and evaporator model
3. Review current status of regulations for the site state · Consider prior submittals · Contact local air quality authority · Determine exemptions,permit application, or notification submittal required
4. Draft client's letter to regulating authorities · Prepare application or notification forms required
5. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
Letter to client defining regulatory requirements and action items required
Letter for package submittal to regulators (if required)
Prepare forms for client to add site-specific information and sign
Prepare process block diagram
Calculate estimate of emission by mass balance for VOC's and burner emissions
Organize appropriate analytical data and MSDS package

Hazardous Material (Application preparation and coordination with State) **$2,695**
Includes the following:
1. Review process, MSDS's, TCLP, and VOC testing to define the scope of any
regulatory issues
2. Review current status of regulations for the site state · Consider prior state submittals · Contact local hazardous waste and water quality authorities · Define whether or not RCRA (B) Permit exemption is feasible ·Define appropriate submittal required for (a) limited permitting, (b)permit-by-rule, (c) tiered permitting, and (d) path to determination of exemption (notification method, etc.)
3. Draft letter to regulating authorities · Prepare application or notification forms required
4. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
· Letter to client defining regulatory requirements and action items
required
· Letter for package submittal to regulators (if required)
· Prepare forms for client to add site-specific information and sign
· Prepare proposed system's technical information and process block diagram
· Calculate estimate of emission by mass balance for VOC's and burner emissions·
· Correlate Air Quality Submittal data
· Organize appropriate analytical data and MSDS package

· Regulatory background of product and exemption/approval precedents

Total Suggested Services.....$2,545

Samsco Evaporator Products
~ Professional Services Support ~
(Cont)

Technical Consultation & Service

· TELEPHONE SUPPORT FOR LIFE OF EVAPORATOR Free/Unlimited

· INSTALLATION: ..... To be quoted following
Contractor's Site Visit
Mechanical installation of equipment will include placement and connection using client's existing (within 10 ft) electrical, plumbing, and fuel sources, as well as supply and installation of exhaust stack, piping, and valves as required by Samsco. It also includes securing necessary permits and complying with inspection criteria as required by local code enforcement authorities. (Assuming permitting/inspection requirements are normal and customary for U.S. industrial sites. If unusual requirements are encountered, additional costs may result.)

· SYSTEM STARTUP & COMMISSIONING by SAMSCO Engineer
.$995/on-site day
Includes pre-installation consultation, supervision of system start-up, (Portal-to-portal)
system adjustments as required, and operator training.
+ Travel at cost
(Requires 2-week notice)

NOTES:
1. Additional $500 charge if the visit/travel is outside normal business
hours (e.g., weekends).
2. Days needed to complete task beyond initial estimate will be billed at
contracted rate.
3. Ask for details of Samsco Service Plans offered for multiple (e.g.
annual) pre-scheduled visits
4. Because Samsco engineer's responsibility is problem identification and
correction of evaporator manufacture problems, service visits will require client to assume the following responsibilities:
· Proper installation of evaporator per Samsco manual, in consultation with
our engineers
· Electrical checkout to confirm proper power connection
· Initial 60-second firing of gas burner, where applicable
· Reporting of any problems to Samsco .
· Ramp up to recommended cycle time per Samsco consultation
· Maintenance of "Observation and Maintenance" chart
· Emptying of evaporator at appropriate intervals
· Skimming floating oil when required

- Routine cleaning of evaporator interior after emptying
- Routine cleaning of evaporator exterior, mist eliminator, and other serviceable components
- Pre-repair cleaning of evaporator to allow Samsco engineers to meet visit's objectives
- Plumbing, electrical, and mechanical contracting services as required.

In addition to this we are estimating :

Transportation: **$ 1000**

Awaiting feedback from Samsco- Estimated Rigging: **$ $500**

Estimated Gas pipe installation: **$ $500**

Estimated Plumbing and Electric hookup: **$ $2500**

Estimated Operating Cost:

Cost of Evap: **1 Gallon @ $0.104 /gallon**
(Calculated based on actual rate of Natural Gas = **$0.87/Therm)**

Operator maintenance: $ TBD Awaiting feedback from Samsco

Vic Palese

"Vic Palese"
<vp@hassall.com>
01/13/2009 11:33 AM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject Evaporator draft proposal - more to come.

Mary Ann,

I am sending this e-mail to you today to keep you informed as to where I am in the process. The data below speaks to the Evaporator only and is somewhat comprehensive.

I will send you more data latter on in the week regarding the cost associated with the way we treat water now - hopefully as comprehensive as this for the comparison you need. We believe it to be about 1/2 the cost per gallon as of now - and even according to Samsco (the Evaporator Company) that is the general rule of thumb - I don't want to miss anything.

The costs associated with the installation of the Evaporator appear to be about $43,500 (Not including Tax) as illustrated below.

The O&M costs are forth coming from the Manufacturer- and the extra cost associated with the actual running of the unit is called out below and based upon a price per therm - Obviously this could vary with the price of energy. It is this operating cost that would be the ideal variable to allow us to qualify for the SEP and at the same time treat some water in our present system to save cost.

Capital Costs - as stated by well known supplier Samsco:

Qty	Evaporator	Unit Price	Total Price
1	Series 500 (P/N M506NAA)	15-18 gph Evaporator · 316L Stainless Steel Tank and Heat Exchanger · UL Approved Control System · Allen Bradley PLC-controlled Sentry System · Allen Bradley PanelView Display · Stainless Steel Evaporator Exterior · NEMA 4 Control Enclosure · Automatic-fill Level Sensor · High-level Alarm Control · External Gas Volume Meter · 110V, 60 Hz (others available) · 2 Year Warranty (includes corrosion protection)	$21,997
	Evaporator Options (items recommended for evaporator service)		
1	Upgrade to Chloride Resistant unit (P/N M50CNAA)	$ 4,351	
1	Combustion Analysis Kit (Portable Electronic for Burner tune-up)	$ 895	
2	Gas Pressure Gauge (simplifies Burner tune-up)	$ 89	$ 178
1	Stack Adapter (specify for SS or CPVC stack)	$ 279	
	Basic Evaporator System (extended items only)		$27,700
	Optional System Features (see "Sentry System" page)		none
	Optional System Accessories (see "System Accessories" page)		$ 2,524

3. Ask for details of Samsco Service Plans offered for multiple (e.g. annual) pre-scheduled visits

4. Because Samsco engineer's responsibility is problem identification and correction of evaporator manufacture problems, service visits will require client to assume the following responsibilities:

- Proper installation of evaporator per Samsco manual, in consultation with our engineers
- Electrical checkout to confirm proper power connection
- Initial 60-second firing of gas burner, where applicable
- Reporting of any problems to Samsco
- Ramp up to recommended cycle time per Samsco consultation
- Maintenance of "Observation and Maintenance" chart
- Emptying of evaporator at appropriate intervals
- Skimming floating oil when required
- Routine cleaning of evaporator interior after emptying
- Routine cleaning of evaporator exterior, mist eliminator, and other serviceable components
- Pre-repair cleaning of evaporator to allow Samsco engineers to meet visit's objectives
- Plumbing, electrical, and mechanical contracting services as required.

In addition to this we are estimating :

Transportation: $ 1000 Awaiting feedback from Samsco- Estimated

Rigging: $ $500 Estimated

Gas pipe installation: $ $500 Estimated

Plumbing and Electric hookup: $ $2500 Estimated

Operating Cost:

Cost of Evap: 1 Gallon @ $0.104 /gallon (Calculated based on actual rate of Natural Gas = $0.87/Therm)

Operator maintenance: $ TBD Awaiting feedback from Samsco

Vic Palese

"Vic Palese"
<vp@hassall.com>
01/12/2009 08:42 AM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject RE: EPA - Status Question

OK - will get this too you this week.

Vic
-----Original Message-----
From: Kowalski.Mary@epamail.epa.gov [mailto:Kowalski.Mary@epamail.epa.gov]
Sent: Monday, January 12, 2009 6:09 AM
To: vp@hassall.com
Subject: RE: EPA - Status Question

In order to answer your qquestions I need more information. Specifically, I need the costs broken down so that I can do a PROJECT analysis run. I need the capital costs, annual costs, labor costs -annual and one-time, and any other costs associated with the project. Also, the current costs of your present procedure. Once I have this info, I will do the run and call you.

Thank you,
Mary Ann
Mary A. Kowalski, MS, MPH
R2 TRI Program Enforcement Coordinator
Pesticides and Toxic Substances Branch
PH.: (732) 906-6815, FAX: (732) 321-6788
kowalski.mary@epa.gov

-----"Vic Palese" <vp@hassall.com> wrote: -----

To: Mary Kowalski/R2/USEPA/US@EPA
From: "Vic Palese" <vp@hassall.com>
Date: 01/09/2009 03:07PM
Subject: RE: EPA - Status Question

Mary Ann,

I'll call you this Monday - Just a thought prior to our conversation - Here
is what I am hoping you can assist me with regarding the SEP.

When I was speaking with Dan he referred to a formula the EPA has to make
certain the SEP was in the framework of the guidelines.

We have decided to go the Evaporator route Vs. the Chemical Treatment - Pending your approval of course. I believe you had some initial positive
feedback already from your associates at EPA regarding the Evaporator method).

The only alteration to the proposal would be the actual amount of wastewater
we evaporate. Instead of basing it on 100% of the wastewater we generate we

would like to evaporate a fixed volume. Whatever might be the operational
cost amount required to qualify for the needed expenditures over and above
the capital investmentto satisfy the SEP.

The calculations I would ask your assistance on would be the following:

If the costs associated with purchasing, transporting, rigging, installing
and training were about $30-$35,000 - and the cost of disposal is about
.05 gal more than we are currently paying - How much water per week or per
month or per year would we have to evaporate over what period of time to
qualify for the program.

Like you, I want to bring this to the next step and move forward, so any
assistance you can render to us will
be appreciated. Before you know it we will be evaporating some of the water
that once entered the sewer system and we can both mark this endeavor as a
success.

Appreciate your cooperation to date.

Vic

-----Original Message-----
From: Kowalski.Mary@epamail.epa.gov
[mailto:Kowalski.Mary@epamail.epa.gov]
Sent: Thursday, January 08, 2009 8:41 AM
To: vp@hassall.com
Subject: RE: EPA - Status Question

I will not be in the office on Friday. I am in today or next week , Tuesday through Friday. I work at home on Mondays. You can contact me at (973) 267-8050 on Monday. Thank you.

Mary Ann

Mary A. Kowalski, MS, MPH
R2 TRI Program Enforcement Coordinator
Pesticides and Toxic Substances Branch
PH.: (732) 906-6815, FAX: (732) 321-6788
kowalski.mary@epa.gov

"Vic Palese"
<vp@hassall.com>

To

"Vic Palese"
<vp@hassall.com>
01/15/2009 07:53 PM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject FW: Evaporator draft proposal - more to come. #

History: This message has been replied to.

Mary Ann - I have 2 quotes attached - perhaps you can run it both ways ? The difference between them is he size and cost - perhaps one works better in the formula. The numbers are broken out on the quotes as well as I broke them out myself at you scroll down the page - if you want to view them together as you input the data let me know and I will call you- we can do it together or if you just want to discuss anything - it might be a good idea.

My Controller said we would not pay any Tax on Capital expendutures associated with our manufacturing process but we would pay 8.625% on expense associated with R&M

He also said that any expense required to start the equipment running would go into capital expense. Perhaps you call that initial expense ?

-----Original Message-----
From: Kowalski.Mary@epamail.epa.gov
[mailto:Kowalski.Mary@epamail.epa.gov]
Sent: Wednesday, January 14, 2009 10:44 AM
To: vp@hassall.com
Subject: Re: Evaporator draft proposal - more to come.

Dear Vic,

I just installed the most recent PROJECT model on my computer. In order to do a successful series of analyses, I will need the following information.

1) For tax purposes does the company file as a C or S corporation?
C Corp.

2) Capital Expenditure or other Initial Expenditure $32769 OR $47856 depending on unit choosen.

3) One-time, Nondepreciable Expenses
This would include installation costs, transprotation, start-up costs, etc. A number, broken down is needed.,

Transport $1000

Bdgt Quot 500 System (19).doc

Bdgt Quot 600 System (19).doc

SAMSCO EVAPORATOR PRODUCTS
~ PROFESSIONAL SERVICES SUPPORT ~

ENVIRONMENTAL WASTEWATER ANALYSIS

Samsco works with analytical laboratories across the U.S. We are pleased to coordinate regulatory work for our clients by arranging laboratory analyses as requested. Typical tests are...

EPA 8260 Volatile Organic Compound (VOC) Analysis (4-day turnaround)..... **$ 350**

TCLP Metals Analysis (RCRA-8 Heavy Metals Test)..... **$ 300**

REGULATORY PERMITTING ASSISTANCE

To ensure environmental compliance, Samsco's Environmental Group offers a permitting service that prepares, coordinates, and expedites the air quality or hazardous materials application paperwork required by your state or regulatory agency.

AIR QUALITY (Application preparation and coordination with State) ..... **$ 2,195**

1. Review process, MSDS's, and VOC testing to define the scope of regulatory issues
2. Prepare mass balances based on VOC testing, waste volume, and evaporator model
3. Review current status of regulations for the site state • Consider prior submittals • Contact local air quality authority • Determine exemptions, permit application, or notification submittal required
4. Draft client's letter to regulating authorities • Prepare application or notification forms required
5. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
    - Letter to client defining regulatory requirements and action items required
    - Letter for package submittal to regulators (if required)
    - Prepare forms for client to add site-specific information and sign
    - Prepare process block diagram
    - Calculate estimate of emission by mass balance for VOC's and burner emissions
    - Organize appropriate analytical data and MSDS package

HAZARDOUS MATERIAL (Application preparation and coordination with State) **$2,695**

Includes the following:

1. Review process, MSDS's, TCLP, and VOC testing to define the scope of any regulatory issues
2. Review current status of regulations for the site state • Consider prior state submittals • Contact local hazardous waste and water quality authorities • Define whether or not RCRA (B) Permit exemption is feasible • Define appropriate submittal required for (a) limited permitting, (b) permit-by-rule, (c) tiered permitting, and (d) path to determination of exemption (notification method, etc.)
3. Draft letter to regulating authorities • Prepare application or notification forms required
4. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
    - Letter to client defining regulatory requirements and action items required
    - Letter for package submittal to regulators (if required)
    - Prepare forms for client to add site-specific information and sign
    - Prepare proposed system's technical information and process block diagram
    - Calculate estimate of emission by mass balance for VOC's and burner emissions
    - Correlate Air Quality Submittal data
    - Organize appropriate analytical data and MSDS package
    - Regulatory background of product and exemption/approval precedents

Total Suggested Services.....$2,545

SAMSCO CORPORATION • 18 Cote Avenue • Goffstown, NH 03045 USA • 603-668-7111 • gdixon@samsco.com

SAMSCO EVAPORATOR PRODUCTS
~ PROFESSIONAL SERVICES SUPPORT ~
(CONT)

TECHNICAL CONSULTATION & SERVICE

- **TELEPHONE SUPPORT FOR LIFE OF EVAPORATOR..... Free/Unlimited**

- **INSTALLATION:** ..... To be quoted following Contractor's Site Visit
  Mechanical installation of equipment will include placement and connection using client's existing (within 10 ft) electrical, plumbing, and fuel sources, as well as supply and installation of exhaust stack, piping, and valves as required by Samsco. It also includes securing necessary permits and complying with inspection criteria as required by local code enforcement authorities. (Assuming permitting/inspection requirements are normal and customary for U.S. industrial sites. If unusual requirements are encountered, additional costs may result.)

- **SYSTEM STARTUP & COMMISSIONING by SAMSCO Engineer** .....$995/on-site day (Portal-to-portal)
  Includes pre-installation consultation, supervision of system start-up, system adjustments as required, and operator training. + Travel at cost
  (Requires 2-week notice)

- **POST-INSTALLATION SITE VISIT** (with 2-week notice) .....As Above
  Priority visit (assumes 24 hour notice) ..... $1,500/on-site day

NOTES:

1. Additional $500 charge if the visit/travel is outside normal business hours (e.g., weekends).
2. Days needed to complete task beyond initial estimate will be billed at contracted rate.
3. Ask for details of Samsco Service Plans offered for *multiple* (e.g. annual) pre-scheduled visits
4. Because Samsco engineer's responsibility is problem identification and correction of evaporator manufacture problems, service visits will require client to assume the following responsibilities:
   - Proper installation of evaporator per Samsco manual, in consultation with our engineers
   - Electrical checkout to confirm proper power connection
   - Initial 60-second firing of gas burner, where applicable
   - Reporting of any problems to Samsco
   - Ramp up to recommended cycle time per Samsco consultation
   - Maintenance of "Observation and Maintenance" chart
   - Emptying of evaporator at appropriate intervals
   - Skimming floating oil when required
   - Routine cleaning of evaporator interior after emptying
   - Routine cleaning of evaporator exterior, mist eliminator, and other serviceable components
   - Pre-repair cleaning of evaporator to allow Samsco engineers to meet visit's objectives
   - Plumbing, electrical, and mechanical contracting services as required.

SAMSCO WATER EVAPORATOR II

~ 600 SERIES • GAS-FIRED ~

QTY	EVAPORATOR	UNIT PRICE	TOTAL PRICE
1	**SERIES 600 (P/N M606NAA)** 33-39 gph Evaporator • 316-L Stainless Steel Tank and Heat Exchanger • UL-approved Control System • Allen Bradley PLC-controlled *SENTRY SYSTEM* • Allen Bradley PanelView Display • Stainless Steel Evaporator Exterior • NEMA-4 Control Enclosure • Automatic-fill Level Sensor • High-level Alarm Control • External Gas Volume Meter • 110V, 1 Ph, 60 Hz power *(others available)* • 2-year Warranty *(includes corrosion protection)*		**$35,189**
	EVAPORATOR ACCESSORIES *(ITEMS RECOMMENDED FOR EASY EVAPORATOR SERVICE)*		
1	Chloride Resistant unit upgrade **(M60CNAA)**		**$ 5,046**
1	Combustion Analysis Kit *(Portable Electronic for Burner tune-up)*		**$ 895**
1	Gas Pressure Gauge Set of 2 gauges *(simplifies Burner tune-up)*		**$ 178**
1	Stack Adapter *(specify for stack of SS or CPVC)*		**$ 279**
	BASIC EVAPORATOR SYSTEM *(EXTENDED ITEMS ONLY)*		**$41,587**
	OPTIONAL SYSTEM FEATURES *(SEE "SENTRY SYSTEM OPTIONS" PAGE)*		**none**
	OPTIONAL SYSTEM ACCESSORIES *(SEE "SYSTEM ACCESSORIES" PAGE)*		**$ 3,724**
	TOTAL SAMSCO SYSTEM:		**$45,311**
	OPTIONAL PROFESSIONAL SERVICES *(SEE "SERVICES SUPPORT" PAGE)*		**$ 2,545**
	OPTIONAL INSTALLATION *(SEE "SERVICES SUPPORT" PAGE)*		**TBD**

~ TERMS & CONDITIONS OF SALE ~

- Pricing: Quotation valid for 30 days from this date
- Payment: 50% deposit with Purchase Order
  Balance due 30 days from date of product shipment,
  1-1/2% monthly charge on amounts due past 30 days
- Shipment: FOB Cleveland, OH
- Cancellation: 25% Restocking Fee for canceled orders

SIGNED: *Gary N. Dixon* January 8, 2009

SAMSCO CORPORATION • 18 Cote Avenue • Goffstown, NH 03045 USA • 603-668-7111 • info@samsco.com

SAMSCO WATER EVAPORATOR II
~ SENTRY SYSTEM OPTIONS ~

QTY	SENTRY SYSTEM OPTIONS	UNIT PRICE	TOTAL PRICE
	AUTO OIL DECANT OPTION (See note below)	$ 2,475	
	AUTO OIL MANAGEMENT OPTION (See note below)	$ 5,556	
	AUTO DRAIN OPTION (See note below)	$ 3,879	
	AUTO DRAIN/AUTO OIL MANAGEMENT OPTION (See note below)	$ 9,435	
	AUTO-pH CONTROL OPTION	$11,500	
	CONDUCTIVITY CONTROL OPTION	$ 5,748	
	REMOTE MONITOR OPTION	$ 1,750	
	AUTO ANTIFOAM INJECTION OPTION	$ 1,495	
	ALARM BEACON OPTION	$ 495	
	AUTO VAPOR RECOVERY OPTION		
	SERIES 600 CONDENSER MODULE	$21,640	
	~ AND ~		
	SERIES 600 DRY AIR COOLER (400K BTU)	$19,143	
	STANDS		
	SERIES 600 STAND (≤ 24" HIGH)	$ 995	
	OPTIONS SUGGESTED:		$ TBD

NOTE: **Includes** required evaporator-mounted probes and auto-valve(s), but **does not include** transfer pump kits. See separate data/price pages for exact components included.

SAMSCO WATER EVAPORATOR
~ SYSTEM ACCESSORIES ~

QTY	SYSTEM ACCESSORIES	UNIT PRICE	TOTAL PRICE
	• Holding Tank: 175 Gallon Capacity (42" Dia x 49" Hgt)	$ 889	
	• Holding Tank: 500 Gallon Capacity (48" Dia x 85" Hgt)	$ 1,733	
	• Holding Tank: 1,050 Gallon Capacity (72" Dia x 84" Hgt)	$ 2,316	
	• Holding Tank: 1,600 Gallon Capacity (88" Dia x 94" Hgt)	$ 2,957	
	• Holding Tank: 2,500 Gallon Capacity (96" Dia x 117" Hgt)	$ 4,642	
	• Tank Sensor: High Level (for Residue Tank or Waste Feed Tank)	$ 759	
	• Tank Sensor: Low Level (up to 8' long, for Waste Feed Tank)	$ 899	
	• Sensor Mount: Single Union (for Holding Tank Level Sensor)	$ 52	
	• Sensor Mount: Four Union (for Tank Level Sensors and Ground Rod)	$ 389	
	• Ground Rod (up to 8' long, required for Sensors in Non-metal Holding Tank)	$ 95	
	• Pump: E5 Poly w/Teflon Diaphragm (for **Cold Waste Feed**)	$ 629	
	• Pump: E5 SS w/Teflon Diaphragm (for **Hot Residue Drain**)	$ 1,299	
1	• Pump: E1 Poly w/Teflon Diaphragm (for Cold Waste Feed)		**$1,259**
1	• Pump: E1 SS w/Teflon Diaphragm (for Hot Residue Drain)		**$1,799**
	• Pump: E4 Poly w/Teflon Diaphragm (for Cold Waste Feed)	$ 2,979	
	• Pump: E4 SS w/Teflon Diaphragm (for Hot Residue Drain)	$ 3,489	
	• Pump Accessory: E5 Air Solenoid Valve Kit (1/Pump)	$ 89	
2	• Pump Accessory: E5/E1 Air Regulator & Filter Kit (1/Pump)	$ 139	**$ 238**
2	• Pump Accessory: E1/E4 Solenoid Valve Kit (1/Pump)	$ 214	**$ 428**
	• Pump Accessory: E4 Air Regulator, Filter, & Lubricator Kit (1/Pump)	$ 329	
	TYPICAL SYSTEM ACCESSORIES:		**$3,724**

- ***Holding Tanks are 120°F-rated, molded polyethylene (other tank materials are available) with conical bottom, domed top, and manway. Tanks include stand and are drop-shipped FOB nearest point of tank manufacture.***
- ***If ordered, Tank bulkhead fittings (for Evaporator Feed and Tank Drain), interior piping, and Tank Level Control mounting plate are shipped with Evaporator for on-site installation.***

SAMSCO CORPORATION • 18 Cote Avenue • Goffstown, NH 03045 USA • 603-668-7111 • info@samsco.com

SAMSCO EVAPORATOR PRODUCTS
~ PROFESSIONAL SERVICES SUPPORT ~

ENVIRONMENTAL WASTEWATER ANALYSIS

Samsco Corporation works with analytical laboratories across the U.S. We will coordinate regulatory work for our clients by arranging laboratory analyses as requested. Typical tests are...

EPA 8260 Volatile Organic Compound (VOC) Analysis (1-week turnaround) ..... **$ 350**

TCLP Metals Analysis (RCRA-8 Heavy Metals Test) ..... **$ 300**

REGULATORY PERMITTING ASSISTANCE

To ensure environmental compliance, Samsco Corporation' Environmental Group offers a permitting service that prepares, coordinates, and expedites the air quality or hazardous materials application paperwork required by your state or regulatory agency.

AIR QUALITY (Application preparation and coordination with State) ..... **$ 2,195**

1. Review process, MSDS', and VOC testing to define the scope of regulatory issues
2. Prepare mass balances based on VOC testing, waste volume, and evaporator model
3. Review current status of regulations for the site state • Consider prior submittals • Contact local air quality authority • Determine exemptions, permit application, or notification submittal required
4. Draft client's letter to regulating authorities • Prepare application or notification forms required
5. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
    - Letter to client defining regulatory requirements and action items required
    - Letter for package submittal to regulators (if required)
    - Prepare forms for client to add site-specific information and sign
    - Prepare process block diagram
    - Calculate estimate of emission by mass balance for VOC's and burner emissions
    - Organize appropriate analytical data and MSDS package

HAZARDOUS MATERIAL (Application preparation and coordination with State) **$2,695**

Includes the following:

1. Review process, MSDS', TCLP, and VOC testing to define the scope of any regulatory issues
2. Review current status of regulations for the site state • Consider prior state submittals • Contact local hazardous waste and water quality authorities • Define whether or not RCRA (B) Permit exemption is feasible • Define appropriate submittal required for (a) limited permitting, (b) permit-by-rule, (c) tiered permitting, and (d) path to determination of exemption (notification method, etc.)
3. Draft letter to regulating authorities • Prepare application or notification forms required
4. Forward documentation package to client for inclusion in site's environmental file and/or for customization prior to submittal to state regulators. Package to include the following:
    - Letter to client defining regulatory requirements and action items required
    - Letter for package submittal to regulators (if required)
    - Prepare forms for client to add site-specific information and sign
    - Prepare proposed system's technical information and process block diagram
    - Calculate estimate of emission by mass balance for VOC's and burner emissions
    - Correlate Air Quality Submittal data
    - Organize appropriate analytical data and MSDS package
    - Regulatory background of product and exemption/approval precedents

Suggested Environmental Services $2,545

SAMSCO CORPORATION • 18 Cote Avenue • Goffstown, NH 03045 USA • 603-668-7111 • info@samsco.com

SAMSCO EVAPORATOR PRODUCTS
~ PROFESSIONAL SERVICES SUPPORT ~
(CONT)

TECHNICAL CONSULTATION & SERVICE

- **TELEPHONE SUPPORT (FOR EVAPORATOR LIFE) ..... Free/Unlimited**

- **INSTALLATION:** ..... Will be quoted subject to confirming Site Visit and assumes mechanical installation of quoted equipment including placement and connection using client's existing (within 10 ft) electrical, plumbing, and fuel sources, as well as supply and installation of exhaust stack, piping, and valves as required by Samsco. It also includes securing necessary permits and complying with inspection criteria as required by local code enforcement authorities. Requirements are assumed to be "normal and customary" for U.S. industrial sites. This will be confirmed following installer's site visit. If unusual requirements exist, additional cost may be involved.

- **SYSTEM STARTUP & COMMISSIONING by SAMSCO Engineer** .....$995/on-site day (Portal-to-portal) + Travel at cost
  Includes pre-installation consultation, supervision of system start-up, system adjustments as required, and operator training. (Requires 2-week notice)

- **POST-INSTALLATION SITE VISIT** (with 2-week notice) .....As Above
  Priority visit (requires at least 24 hour notice) ..... $1,500/on-site day

NOTES:

1. Additional $500 charge if the visit/travel is outside normal business hours (e.g., weekends).
2. Days needed to complete task beyond initial estimate will be billed at contracted rate.
3. Samsco offers Service Plans for *multiple* (e.g. regular, annual) pre-scheduled visits
4. Because Samsco engineer's responsibility is problem identification and correction of evaporator manufacture problems, service visits require client to assume the following responsibilities:
   - Proper installation of evaporator per Samsco manual (in consultation with our engineers)
   - Electrical checkout to confirm proper power connection
   - Initial 60-second firing of gas burner, if applicable
   - Reporting of any problems to Samsco
   - Ramp up to recommended cycle time per Samsco consultation
   - Maintenance of "Observation and Maintenance" chart
   - Emptying of evaporator at appropriate intervals
   - Skimming floating oil when required
   - Routine cleaning of evaporator interior after emptying
   - Routine cleaning of evaporator exterior, mist eliminator, and other serviceable components
   - Pre-repair cleaning of evaporator to allow Samsco engineers to meet visit's objectives
   - Plumbing, electrical, and mechanical contracting services as required.

"Vic Palese"
<vp@hassall.com>

02/26/2009 11:26 AM

Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA

cc

bcc

Subject FW: H2M Emailed Analytical Report for Vic Palese

Mary Ann,

Attached is a typical result from our laboratory regarding analytical results of Nassau County specified parameters for wastewater discharge into the sewer system.

0812329 Vic Palese.pdf

H2M LABS, INC.

575 Broad Hollow Road, Melville NY 11747
(631) 694-3040 . FAX: (631) 420-8436 NYSDOH ID # 10478

LABORATORY RESULTS

JOHN HASSALL, INC.
609-1 CANTIAGUE ROCK RD.
WESTBURY, NY 11590
Attn To : Al Polidoro

Lab No. : 0812329-001A

Client ID. : JHI WWTP

Sample Information...
Type : Industrial Waste

Origin:

Collected : 10/20/2008 1:10:00 PM
Received : 10/20/2008 1:58:00 PM
Collected By : CLIENT
Copy : Vic Palese
CC

Parameter(s)	Results	Qualifier	D.F.	Units	Method Number	Analyzed
Chromium	0.71		1	mg/L	E200.7	10/23/2008 12:27 PM
Copper	0.78		1	mg/L	E200.7	10/23/2008 12:27 PM
Nickel	0.92		1	mg/L	E200.7	10/23/2008 12:27 PM
Hexane Extractable Material (O&G)	< 5.0		1	mg/L	E1664A	10/31/2008 9:00 AM
pH	8.7		1	pH Units	E150.1	10/20/2008 5:30 PM

Qualifiers: E - Value above quantitation range
D - Results for Dilution

D.F. = Dilution Factor

Date Reported : 10/31/2008

Joann M. Slavin

Laboratory Manager

"Vic Palese"
<vp@hassall.com>
04/21/2009 04:40 PM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject John Hassall SEP

History: This message has been replied to.

Mary Ann,

Just an idea to get this project off the ground - Can we get away from smaller details and focus on a broader goal with specific spending and operational requirements?

For Example: (Conservative - I really believe $65000 plus will be the number but do not want to overshoot))

John Hassall will commit to spending (say) a minimum of $35000 on capital expense and will evaporate a minimum average of 2500 gallons of wastewater per week or 650,000 gallons over a five year period maximum. (This maximum number of gallons evaporated could be extended over a longer period if business conditions slow down)

The cost of evaporation vs. our current method is as follows:

Cost of Evap: 1 Gallon @ $0.104 /gallon (Calculated based on actual rate of Natural Gas = $0.87/Therm)

Vs. Cost for Chemical Treatment : .0676/gal

The above proposal will allow me to shop for perhaps a slightly used unit and offset the cost associated with all the other aspects of the project - Tanks, piping, pumps, alarms etc. Total actual dollars spent will meet the EPA's requirement.

Vic Palese

.97

"Vic Palese"
<vp@hassall.com>
04/28/2009 11:20 AM
Please respond to
<vp@hassall.com>

To Mary Kowalski/R2/USEPA/US@EPA
cc
bcc
Subject Mary Ann - Will this do?

In order for us to evaporate 104,000 gallons of wastewater annually for a five year period, at a minimum we must take the following steps:

Locate, purchase and install an Evaporator unit which is compatible with our wastewater stream and capable of evaporating 104,000 gallons a year, for at least five years.

Plumb a natural gas line to the unit for it's fuel, as well as pipe the exhaust of the units flue gas and evaporated water out of the building. This will also involve some type of roof work to accommodate the necessary pipes and vents.

Install the necessary electrics and controls to power the unit and its accessories.

Install a holding tank which accumulates the water intended to feed the Evaporator. The tank must be plumbed from the area of wastewater accumulation as well as to the Evaporator unit itself. There will be a series of pumps which will help regulate flow and meter the water to the Evaporator.

Install an oil skimmer on the Holding Tank to eliminate oils from entering the evaporator unit and a oil storage tank to hold the accumulated oil.

Install a flow meter going to the Evaporator which can store information on wastewater flow to validate CAFO.

We will commit to spending at least $32,393.00 on this SEP. The costs associated with capital equipment and labor will most likely exceed this price significantly.

Within 45 days of approval 1/2 of the $10,798.00 penalty must be paid and the balance will be paid in January , 2010.